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17 Attorneys for Defendants

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 NAVAJO HEALTH FOUNDATION – SAGE  
21 MEMORIAL HOSPITAL, INC. (doing business  
22 as “Sage Memorial Hospital”); an Arizona non-  
23 profit corporation

24 Case No. 2:19-cv-00329-GMN-EJY

Plaintiff,  
v.  
RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company (doing  
business as “Razaghi Healthcare”), et al.,  
Defendants.

**JOINT STIPULATION TO  
EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF’S FIRST AMENDED  
COMPLAINT [ECF No. 137]  
(SECOND REQUEST)**

IT IS HEREBY STIPULATED AND AGREED that Defendants Razaghi Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively, “Defendants”) shall have an additional three-week extension of time, up to and including July 30, 2021 to respond to Plaintiff’s First Amended Complaint (ECF No. 137). On June 10, 2021 the Court, pursuant to the joint stipulation of the parties (ECF No. 138), granted

1 Defendants an extension (ECF No. 139) to July 9, 2021 to accommodate defense counsel's  
2 case load. The parties have now stipulated to an additional short extension due to defense  
3 counsel's case load, including extensive pretrial obligations on an unrelated matter, the  
4 intervening holiday, and pre-planned vacations. The additional time requested herein will  
5 permit counsel for Defendants to meet other pre-set case commitments and allow  
6 Defendants sufficient time to prepare, review, and finalize their response to the First  
7 Amended Complaint, especially considering the complexity of the issues in this case and  
8 the length and breadth of the First Amended Complaint. This request is made in good faith  
9 and not for the purpose of delay. Neither party will be prejudiced by the requested extension.  
10 This is the second request to extend this deadline.

11 For the reasons set forth above, the parties ask the Court to approve this stipulation  
12 to extend the time for Defendants to respond to the First Amended Complaint from July 9,  
13 2021 up to and including July 30, 2021.

14 RESPECTFULLY SUBMITTED this 9th day of July 2021.

15 JENNER & BLOCK LLP

FISHER & PHILLIPS LLP

16 /s/ Douglass A. Mitchell (with permission)  
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21 IT IS SO ORDERED:  
22   
23 UNITED STATES MAGISTRATE JUDGE

24 Dated: July 9, 2021